

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIG INSURANCE COMPANY,

Plaintiff,

-against-

THE FAIRCHILD CORPORATION and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Defendants.

Civil Action No. 07 Civ. 8250 (JGK)

ECF case

**MOTION FOR ADMISSION *PRO HAC*
VICE OF PETER V. BAUGHER AND
TIMOTHY C. SAMUELSON**

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
2007 DEC 11 PM 1:13

PLEASE TAKE NOTICE that Defendant THE FAIRCHILD CORPORATION, by their undersigned counsel, pursuant to Rule 1.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, respectfully requests that this Court enter an Order permitting Peter V. Baugher and Timothy C. Samuelson to practice in this particular case based upon the following grounds:

1. Peter V. Baugher and Timothy C. Samuelson represent Defendant The Fairchild Corporation as co-counsel with the undersigned, Ira Brad Matetsky.

2. Ira Brad Matetsky is a member in good standing of the Bar of the State of New York and of this Court, and a partner of the law firm of Ganfer & Shore, LLP, 360 Lexington Avenue, New York, NY 10017.

3. Peter V. Baugher is a member in good standing of the Bar of the State of Illinois and a partner of the law firm of Schopf & Weiss LLP, One South Wacker, 28th Floor, Chicago, Illinois 60606.

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4. Timothy C. Samuelson is a member in good standing of the Bar of the State of Illinois and the Bar of the State of Indiana, and is associated with the law firm of Schopf & Weiss LLP, One South Wacker, 28th Floor, Chicago, Illinois 60606.

5. Simultaneously with the filing of this Motion, Ira Brad Matetsky is paying the prescribed *pro hac vice* admission fee on behalf of Peter V. Baugher and Timothy C. Samuelson.

6. Peter V. Baugher and Timothy C. Samuelson are familiar with the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and will agree, at all times, to abide and comply with these rules.

7. In compliance with Rule 1.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, the undersigned have attached a certificate of good standing from the Bar of the State of Illinois for Peter V. Baugher, and certificates of good standing from the Bars of the States of Illinois and Indiana for Timothy C. Samuelson. True and correct copies of the certificates of good standing for Peter V. Baugher and Timothy C. Samuelson are attached hereto as Exhibits "B," "C" and "D," respectively. Copies of the Affidavits of Peter V. Baugher and Timothy C. Samuelson in support of the instant motion are attached hereto as Exhibits "E" and "F," respectively.

8. There are no pending disciplinary proceedings against Peter V. Baugher and Timothy C. Samuelson.

9. The undersigned consents to being designated as a lawyer who maintains an office in this District for the practice of law with whom the Court and opposing counsel may readily communicate.

WHEREFORE, Defendant THE FAIRCHILD CORPORATION, respectfully requests that this Court enter an Order (a copy of which is annexed hereto as Exhibit "A") permitting

Peter V. Baugher and Timothy C. Samuelson to appear *pro hac vice* in this particular case, together with such other and further relief as this Court may deem just and proper.

Dated: December 11, 2007
New York, New York

Respectfully submitted,

GANFER & SHORE, LLP

By: 
Ira Brad Matetsky (IM1881)
360 Lexington Avenue, 14th floor
New York, New York 10017
(212) 922-9250
(212) 922-9335 (facsimile)
imatetsky@ganshore.com
Attorneys for Defendant
The Fairchild Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIG INSURANCE COMPANY,

Plaintiff,

-against-

THE FAIRCHILD CORPORATION and
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**AFFIDAVIT OF IRA BRAD
MATESKY IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE OF
PETER V. BAUGHER AND
TIMOTHY C. SAMUELSON**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

IRA BRAD MATETSKY, being duly sworn, deposes and says:

1. I am a Member of Ganfer & Shore, LLP, counsel for Defendant THE FAIRCHILD CORPORATION in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Peter V. Baugher and Timothy C. Samuelson as counsel *pro hac vice* to represent Defendant THE FAIRCHILD CORPORATION in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Messrs. Baugher and Samuelson since the inception of this litigation.

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ORDER

Upon the Motion for Admission *Pro Hac Vice*, dated December 11, 2007, the Affidavit of Ira Brad Matetsky, sworn to on December 11, 2007, and the Affidavits of Peter V. Baugher and Timothy C. Samuelson sworn to on December 5, 2007, and the exhibits annexed thereto, seeking an Order pursuant to Local Civil Rule 1.3(a) of the United States District Courts for the Southern and Eastern Districts of New York permitting Peter V. Baugher and Timothy C. Samuelson to argue or try the above captioned action, in whole or in part, as counsel or advocate, and good cause having been demonstrated in support of said motion, it is:

ORDERED, that Peter V. Baugher and Timothy C. Samuelson are hereby admitted as counsel *pro hac vice* in this case.

Dated: New York, New York
December ___, 2007

SO ORDERED:

U.S.D.J.



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

One North Old Capitol Plaza, Suite 333
Springfield, IL 62701
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Peter Vincent Baugher
Schopf & Weiss, LLP
One South Wacker Drive, 28th Floor
Chicago, IL 60606-4617


Chicago
Thursday, November 29, 2007

In re: Peter Vincent Baugher
Admitted: 6/4/1974
Attorney No. 0138282

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,
Jerome Larkin
Administrator

By: 
Thomas W. Peters
Registrar

TWP:jpo



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

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Springfield, IL 62701
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Timothy Craig Samuelson
Schopf & Weiss, LLP
One South Wacker Drive, 28th Floor
Chicago, IL 60606-4617


Chicago
Thursday, November 29, 2007

In re: Timothy Craig Samuelson
Admitted: 11/5/1998
Attorney No. 6256620

To Whom It May Concern:

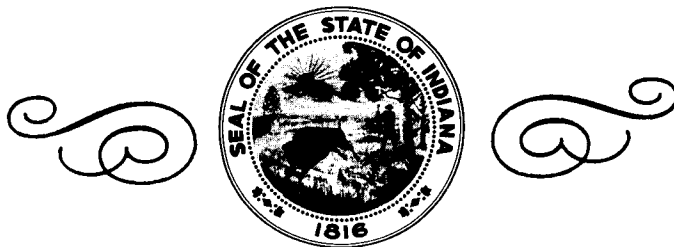
The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,
Jerome Larkin
Administrator

By: 
Thomas W. Peters
Registrar

TWP:jpo

SUPREME COURT OF THE STATE OF INDIANA



Certification

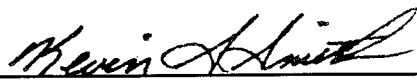
STATE OF INDIANA, SS:

I, Kevin S. Smith, Clerk of the Supreme Court
of Indiana, do hereby certify that

TIMOTHY CRAIG SAMUELSON

is a member of the bar of said Court since admission on
JULY 12th 1999, and is in good
standing therein.

GIVEN under my hand and the seal of said Court at Indianapolis,
Indiana, this 30th day of NOVEMBER, 20 07.



KEVIN S. SMITH
CLERK, SUPREME COURT OF INDIANA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIG INSURANCE COMPANY,

Plaintiff,

-against-

THE FAIRCHILD CORPORATION and
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COMPANY OF PITTSBURGH, PA,

Defendants.

Civil Action No.: 07civ8250
ECF case (JGK)

**AFFIDAVIT OF PETER V. BAUGHER
IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

STATE OF ILLINOIS)
) ss:
COUNTY OF COOK)

Peter V. Baugher being duly sworn, deposes and says:

1. I am a partner in the law firm of Schopf & Weiss LLP, One South Wacker, 28th Floor, Chicago, Illinois 60606.
2. I submit this Affidavit in support of my Motion seeking admission *pro hac vice*, as an attorney for Defendant The Fairchild Corporation in this action.
3. I am also a member in good standing of the bars of the State of Illinois; and United States District Court, Northern District of Illinois. (Attached as Exhibit "A" is a certificate of good standing dated 11/29/07 for the State of Illinois).
4. I have read the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. As such, I am fully familiar with such Rules and intend to comply with them.
5. Ganfer & Shore, LLP will act as local counsel for Defendants.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIG INSURANCE COMPANY,

Plaintiff,

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COMPANY OF PITTSBURGH, PA,

Defendants.

Civil Action No.: 07civ8250
ECF case (JGK)

**AFFIDAVIT OF TIMOTHY C. SAMUELSON
IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

STATE OF ILLINOIS)
) ss:
COUNTY OF COOK)

Timothy C. Samuelson being duly sworn, deposes and says:

1. I am associated with the law firm of Schopf & Weiss LLP, One South Wacker, 28th Floor, Chicago, Illinois 60606.

2. I submit this Affidavit in support of my Motion seeking admission *pro hac vice*, as an attorney for Defendant The Fairchild Corporation in this action.

3. I am also a member in good standing of the bars of the State of Illinois; State of Indiana; United States District Court, Northern District of Illinois; United States District Court, Northern District of Indiana. (Attached as Exhibits "A" and "B" are certificates of good standing dated 11/29/07 for the State of Illinois and the 11/30/07 for the State of Indiana, respectively).

4. I have read the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. As such, I am fully familiar with such Rules and intend to comply with them.

5. Ganfer & Shore, LLP will act as local counsel for Defendants.

6. I hereby attest that no disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

WHEREFORE, I respectfully request that I be admitted to practice *pro hac vice* for the purpose of representing Defendant The Fairchild Corporation in this action.


Timothy C. Samuelson

Sworn to before me this 5th
Day of December, 2007


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
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THE FAIRCHILD CORPORATION and
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COMPANY OF PITTSBURGH, PA,

Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2007, the accompanying MOTION FOR ADMISSION PRO HAC VICE OF PETER V. BAUGHER AND TIMOTHY C. SAMUELSON AND PROPOSED ORDER was served by Federal Express, Tracking Nos. 8335 4180 3228, and 8535 4180 3239, respectively, upon the following parties and participants:

Malcom I. Lewin
Ethan R. Holtz
Morrison Cohen LLP
909 Third Avenue
New York, New York 10022
Attorneys for Plaintiff
TIG Insurance Company

Crystal L. Nicosia
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Attorneys for Defendant
National Union Fire Insurance
Company of Pittsburgh, PA

Dated: December 11, 2007
New York, New York

GANFER & SHORE, LLP

By: 
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360 Lexington Avenue, 14th floor
New York, New York 10017
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The Fairchild Corporation